

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

American Humanist Association,)	Case # 8:14-CV-550-DKC
Steven Lowe, Fred Edwards,)	
And Bishop McNeill)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
Maryland-National Capital Park and)	
Planning Commission,)	
<i>Defendant.</i>)	

**MOTION FOR LEAVE TO SUBMIT MEMORANDUM OF *AMICI CURIAE*
IN SUPPORT OF PLAINTIFFS’S MOTION FOR SUMMARY JUDGMENT**

1. The Council on American-Islamic Relations (“CAIR”) respectfully submits this Motion for Leave to file a memorandum of *amici curiae* in support of the Plaintiff in this case.

2. In light of this Honorable Court’s order of September 18, 2014, granting status as amici curiae to “Eleven Marylanders,” and directing them “to seek leave to file an amicus curiae memorandum in support of Defendant if and when dispositive motions are filed,” (ECF #46, pg. 7), CAIR hereby requests status as amicus curiae and submits this Motion for leave to file a memorandum in support of the Plaintiff’s Motion for Summary Judgment (Docket #80).

3. CAIR is the nation’s largest Muslim civil rights and liberties organization. CAIR is an independently operated 501(c)(3) registered nonprofit organization. CAIR is committed to defending the separation of church and state and has a particular interest in ensuring that the court understands how public displays that associate military service with Christian symbols do not represent Muslim service members and, in so doing, send an unconstitutional message that conflates Christianity in particular with military sacrifice and endorse Christianity as a religion

preferred by the state.

4. There are several other minority religious faith organizations that may join CAIR as *amici* on the brief if approved for filing by the Court.

5. Movant confirms service of this motion on counsel of record for the Plaintiffs and Defendant via the Court's electronic filing system.

6. CAIR respectfully asks for 30 days within which to file its amicus brief in support of the Plaintiffs' motion for summary judgment.

7. Undersigned counsel has contacted attorneys for the Defendants, Tracey Harvin, Esq. and William Dickerson, Esq., and for the Intervenors, Roger Byron, Esq., requesting their position on this motion. As of the time of filing this motion, no response has been received from counsel.

8. Counsel for the plaintiffs has indicated it has no objection to the filing of this motion, or the submission of an *amici curiae* brief supporting the plaintiffs' motion for summary judgment.

WHEREFORE, for these reasons as well as any other reasons deemed meritorious to the Court, CAIR asks that the Court grant this motion for leave to file.

Respectfully submitted,

/s/

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